

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend the specification.
2. Amend claims 1-3, 5-9 and 11-19 to delete reference numerals.
3. Point out that the office action has overlooked the Preliminary Amendment filed with the application, and thus has examined an incorrect set of claims.
4. Add new dependent claims 24 – 27, dependent upon claims 1, 7, 11, and 15, respectively.
5. Respectfully traverse all prior art rejections.

B. PATENTABILITY OF THE CLAIMS

Claims 1-23 stand rejected under 35 USC §102(e) as being anticipated by U.S. Patent 6,725,039 to Parmar et al. All prior art rejections are respectfully traversed for at least the following reasons.

Apparently the office action, in ostensibly rejecting claims 1 – 23, has overlooked the Preliminary Amendment filed simultaneously with the captioned application. The undersigned sees the Preliminary Amendment in the US Patent and Trademark Office PAIR system, so neither the Preliminary Amendment nor proof of filing thereof should be necessary. Applicants respectfully request that the correct set of claims be examined.

The claims now appearing in this Amendment reflect the correct set of claims resulting from the Preliminary Amendment. The present Amendment serves to amend the claims only for deleting reference numerals in accordance with US custom.

For sake of expediting prosecution, Applicants treat the rejections of the office action (albeit direct to wrong claims) as if it were instead directed to the proper set of claims. In this regard Applicants point out a few general but fatal fallacies of the prior rejections of the office action:

1. Parmar teaches an inter system handover (from GSM to UMTS), which is something quite different from a “group reset” of a number of user equipments resulting from occurrence of a reset procedure.

2. Parmar’s soft handover does not affect a subset of connections, but rather one connection involving one UE. In this regard, see, e.g., col. 3, lines 61 (“.. the MS/UE..”); col. 4, lines 5 – 6 (“...the GSM call...”); col. 4, lines 25 (“...the successful handover of the UE to UMTS”); col. 4, lines 30 – 31 (“...to the UE...”).

3. Parmar does not teach release of even one connection, much less a subset of connections. It is again stressed that Parmar teaches a soft handover of an existing connection, not a release of a connection. See, e.g., col. 4, lines 33 – 34: “.. to switch the call from a GSM call into a UMTS call ...” does not indicate connection release, but a continuation of the call albeit with different resources.

4. Since the Parmar handover results in switching of the call from one network to another, Parmar does not teach returning his UE to an idle mode.

Applicants believe that the foregoing cursory distinctions amply emphasize that Parmar is an ineffective reference against the claims, and should be withdrawn.

C. NEW CLAIMS

New dependent claims 24 – 27, dependent upon claims 1, 7, 11, and 15, require that the reset procedure occur as a result of a failure of the node or of a core network

node. These new claims are amply supported by the specification, including, e.g., paragraphs [00020] and [00021].

D. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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